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URGENT REQUEST

June 21, 2005

Arthur Neal, Director Program Administration National Organic Program USDA-AMS—TMP-NOP 1400 Independence Avenue, SW Room 4008—So. Ag Stop 0268 Washington, DC 20250

RE: TM-04-07 National Organic Program, Sunset Review

Dear Mr. Neal:

The International Food Additives Council (IFAC) is an international trade organization representing companies that produce high quality substances used worldwide as food additives. A number of ingredients currently listed under "Sec. 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products label as 'organic' or 'made with organic (specified ingredients or food groups(s)" are produced by IFAC members.

IFAC believes that more than 60 days are required to respond to the level of detail USDA is requesting in the ANPRM mentioned above. Therefore, IFAC respectfully requests a 60-day extension to respond to this ANPRM. Thank you for considering IFAC's request.

Respectfully submitted,

Lyn O'Brien Nabors

Lyn O'Brien Nabors President